

**2022 ARPA Oversight Office**  
**Criminal Justice Planning Agency**

**ARPA Non-Profit Assistance Program (NAP)**

**PROPOSAL SUMMARY**

The American Samoa Criminal Justice Planning Agency is proposing for funding of \$4,500,000.00 to aid non-profit organizations in sustaining and advancing necessary services and programs to benefit direct beneficiaries in the territory during these unprecedented times of the COVID 19 pandemic. Nonprofit organizations provide essential goods and services to the public community that can either not afford to provide for themselves, are not eligible for government aid, or lack the know-how to provide for themselves by way of government and for-profit entity standards. Nonprofits have also been proven to provide opportunities of employment for various individuals who are either ineligible to apply for government employment or do not meet the credential requirements for various employments in both public and private sectors. In saying so, various nonprofits have become encumbered with loss due to the pandemic and the measures taken by the American Samoa Government (ASG) with multiple public emergency declarations. Loss has been in forms of instant decline of human capital and opportunities to obtain funds due to mandated restrictions.

**OVERVIEW**

Non-profit institutions play a prominent and essential role in the economic establishment and structure of communities in the territory of American Samoa. The primary goal of such entities is initiated with the purpose of providing necessary services to communities where they operate as an intermediary between beneficiaries and authorities, and to transcend beyond community-faced hardships. Especially in neglected areas, where there is a high demand for services that non-profits may respond more flexibly in meeting the expectations of recipients seeking assistance. Non-profits aim to serve the differing interests and needs of society and its community that arise in health care, education and social services which are critical assets to promoting the welfare, security and safety of communities. Thus, non-profits are substantially important in providing essential services, to include collaborative partnerships with government entities and various agencies, that ensure stability, sustainability and growth for the territory of American Samoa.

Non-profits have faced several challenges and have been negatively impacted by the COVID-19 pandemic and its effects on the local economy.

Non-profits have been stretched thin in an effort to continue providing the necessary services that are in high demand from the public. The exacerbation of resources creates financial distress and budget restriction, causing an inability to meet local needs and necessities. These financial

hardships have exhausted and overwhelmed non-profit organizations. Emergency relief funds and generous donations have helped stave off dramatic losses. However, continuing into another year of the pandemic brings more uncertainty and financial hardship for non-profits. In an effort to help advance the operations of these entities, the Criminal Justice Planning Agency seeks to prioritize this funding assistance to support goals and initiatives for non-profit entities during a public health emergency pandemic, and to provide direct assistance to better serve communities and the people of American Samoa.

## **PROJECT BACKGROUND**

American Samoa is a territory of the United States, remotely located in the South Pacific, with an estimated 50,000 population of residents. As of recent, the widespread dissemination of the COVID-19 pandemic has greatly impacted the territory, expanding its reach over communities and locally affected areas. Non-profit entities have been profoundly stricken with challenges to their overall operations and sustainability. Forced furlough of employees to adhere to ASG public emergency declarations for COVID-19 has resulted to a decrease of manpower to execute services and programs for the public. A considerable drawback in service initiatives, fundraising, and critical reduction in program-derived revenue, are due to an inability to implement program initiatives to provide proper services to an extensive community who encounters its own financial concerns. Non-profit entities play a crucial role in establishing safe and healthy communities and providing crucial services that benefit economic leverage and stability. Strengthening communities through culminating and fostering community relations and deep local knowledge, non-profits create the connections and infrastructure in building communities that generate development and opportunities. The conditions facing non-profits and the need for immediate and long-term support to ensure the provision of critical services throughout American Samoa is urgent. The assistance for non-profits will provide substantial support to mitigate financial burdens, sustain operations, and provide direct access to delivery of services and goods for beneficiaries.

In addition to the operational challenges faced by non-profits, the growing needs of our territory continue to increase in demand while government resources continue to downsize, placing a strain on their already limited resources, to include the availability of capital, lines of credit, and loan services. Charitable organizations, private foundations, and public foundations play a fundamental role in raising equitable and thriving communities. These organizations seek investment funds from government entities, fundraisers and private donors to help sustain operations. The nonprofit sector is essential in creating strong and healthy communities, and are committed to using human capital, as well as dollars, to help strengthen the sector. However, considering the undeniable challenges in which lie ahead, requires the need to build the capacity of community-based non-profits and strengthening networks with government entities, community partners and stakeholders to directly impact the communities in which they serve. Recognizably, the consequence of this impact stipulates a major disadvantage to underserved communities whose needs are not properly communicated, in terms of health and safety. Nonprofits bear the burden of providing refuge to residents and communities in response to COVID-19 pandemic, in the midst of an emergency health crisis and times of economic uncertainty. The commitment of nonprofits goes without recognition in serving and remaining the constant support for its community's needs.

Nonprofits, by nature, serve with resiliency and grit, as aforementioned, these nonprofit organizations continue to support communities across the territory during the COVID-19

Pandemic, especially the rapid effects made by many to respond to the emergency health crisis. However, American Samoa and its communities and economy are facing unprecedented challenges. With the ASG issued Code Red Initiative and the issuance of the emergency health declaration island-wide, the need for resources to address these issues are far-reaching than what is available. Citing financial hardship as the leading challenge, the uncertainty of not knowing how long the pandemic would last is a focus of concern. Nonprofits face the uncertainty of how to continue program operations, or how they would be able to restart their organizations in an unprecedented situation with an unprecedented time frame. The long-term effects are potentially detrimental to overall program operations and functions. With the emergency health declaration in effect, several businesses, public and private schools and churches have closed their doors. These closures, adhering to stay-at-home orders, and social distancing regulations have posed difficulties for nonprofits to provide consistent timely service delivery to community needs.

Nonprofits with a health and human service mission places a high priority on organizational responsiveness and accountability for citizens' needs. These nonprofit entities cater to the social and human service sectors that play a vital role in our island communities. An example: centers for the elderly and hospice homes that cater to the needs of the elderly population and individuals with disabilities. Essential care services for senior and severely disabled patients require proper and extensive care and observation, a basic necessity that their own families/caregivers are not able to provide. Service providers devote their time to ensure that the elderly and individuals with disabilities are well cared for. They are among the most vulnerable population to contract the COVID-19 virus so extra care and precautionary measures are taken to ensure their safety. The elderly living in hospice care often have complex needs that require constant physical contact so, prevention methods and control measures such as social distancing and isolation has become a significant challenge for residents and staff to perform their jobs. The consequences of providing safe care with social distancing and isolation measures in a hospice facility requires additional manpower to secure the premises and ensuring the safety and health of residents while adhering to COVID-19 Public Health Emergency Declaration enforcement and regulations. This funding assistance shall aid in recruitment and hiring of security officer positions that will ensure the safety and well-being of patients while care providers and staff respond directly to patient needs.

Nonprofit religious organizations with faith-based missions and goals play a pivotal role in society and local communities in American Samoa. They encourage strengthen community relationships, provide individuals a space to worship freely, shelter distressed individuals along with the less fortunate, all of which enable emotional support and spiritual and at times, physical, healing. Religious entities aid communities in American Samoa as majority of locals are of Christian faith and have continued to protect and strengthen morality in communities. Since Code Red, churches across the territory have closed due to the COVID-19 Public Health Emergency Declaration. The impact of COVID-19 on local church organizations have banned large gatherings resulting in ministry leaders having to transition to a virtual platform where they have been able to practice their faith while obeying the ASG mandates. On a positive note, virtual access provides a far-reaching audience that not only enabled people to connect locally but afforded them to connect with people globally. Ministry leaders and workers rely heavily on donations from the public and private donors. Religion provides a spiritual, social and psychological support to individuals, families, and communities in light of struggling times, especially, with the widespread transmission of COVID-19 within our islands. There is a high demand for religious services to resume regularly to meet the social needs of communities and to establish moral order. Funding assistance shall help religious organizations with financial

distress, and to properly equip ministries with technological infrastructure to continue virtual accessibility and providing direct religious services to communities.

Nonprofit charitable organizations have contributed substantially to American Samoa's economic infrastructure and its communities. These nonprofit entities seek community service, advance humanitarian efforts, making a positive impact in society through service, selflessness and advocacy. Charity organizations have helped to support low-income families during the COVID-19 pandemic by fundraising to provide financial support to secure basic necessities and to pay for utility bills. Charity organizations have partnered with government departments as well as other nonprofit entities to support families and communities who have been impacted by the pandemic. The good work of such nonprofit organizations helps to inspire individuals of all ages and various ethnic communities to work together in times of crisis and to contribute to society. Providing financial assistance to these nonprofit organizations will allow delivery of essential services to disadvantaged communities during the Public Health Emergency and to address the needs of local communities.

Nonprofits with an education mission provide a wide range of educational and intellectual programs, tutoring, recreational support, and much more. With the closure of public and private schools due to COVID-19, it has diminished a face-to-face learning environment with children making parents and guardians become overnight appointed teachers. As a consequence, parents are now tasked to teach classroom subjects in effective ways while trying to keep the children engaged. This calls for an increased need for qualified tutors to meet educational needs who can perform their services using virtual platforms. Thus, education-driven nonprofit entities provide essential support in educational background, with an array of programs from peer learning, mentoring, tutoring services, and afterschool programs to successfully meet the needs of children. The support of these entities also prevent children from spiraling into a life of delinquency and encourage interaction in an environment conducive to learning. Financial assistance will help to provide virtual accessibility for nonprofit entities to continue educational services and program initiatives for children and their families during the pandemic.

Considering the variety of nonprofit capacities and its crucial impact in our communities, it is one of our territory's greatest means of support for the people of American Samoa. In light of the COVID-19 Pandemic, non-profit entities have been highlighted as crucial players in economic growth, infrastructure and social welfare. This funding assistance will greatly support nonprofit organizations to cover an array of operational challenges, financial hardships and loss of revenue during Code Red. Building healthy relationships and shared interests among local communities will foster a strong dynamic for nonprofit sectors and leadership. The support and benefit of nonprofit organizations will cultivate strengthened connections with an extensive range of nonprofit entities with respective missions and programs that will provide service delivery to all of American Samoa and its communities.

## **PROJECT DESCRIPTION**

The ARPA Non-Profit Assistance Program (NAP) seeks to provide assistance to the non-profit sector in American Samoa in light of the outbreak of COVID-19 pandemic in our communities, to mitigate financial losses and decreases in revenue due to business closure during the Code Red

Declaration. This program proposed by the American Samoa Criminal Justice Planning Agency will aid non-profits tremendously as aligned with the American Samoa Recovery Plan Act mission to support such eligible non-profit entities that have been negatively impacted by the COVID-19 pandemic. Furthermore, this program will provide allocation to help non-profits respond directly to the COVID-19 pandemic, by means of providing essential services to disadvantaged communities while accommodating COVID-19 regulations and mandates in effect. In response to the COVID-19 pandemic and public health emergency declaration, the proposed program reassures non-profit entities are financially equipped to continue organizational sustainability, operational function, and facilitate access to constituents and communities in which services are delivered to, as timely and accurately as possible.

Non-profit recipients must satisfy the application process, as well as the statutory requirements for eligibility as per ARPA guidelines. Organizations or entity must meet the definition of “non-profit” – especially those that are 501(c)(3) or 501(c)(19) which are tax-exempt organizations. Organizations that have experienced decrease in revenue as previously mentioned, due to the impact of COVID-19, or has faced a financial hardship to cover an array of costs, including payroll costs, operating costs. Non-profits that provide essential and direct services to constituents

#### Prioritized areas for applicants

1. Service to the community
  - building strong relationships with constituents and capacity to serve and learn from disproportioned communities.
  - Addressing safety concerns and basic operational needs to ensure that distribution of information is timely and accurate for constituents (individuals and communities).
  - Facilitate access to communities to deliver programs/services by non-profit partners
2. Strengthening non-profit’s emergency response capacity
  - adaptive capacity considering changes in client needs, as well as enhancing current services provided
3. Increase direct outreach
  - calls, virtual calls, surveys, door-to-door check-ins
4. Support direct service providers and caregivers
  - Prioritize a well-functioning organizational team, transparent communication with staff and support
5. Direct response to COVID-19 pandemic
  - Clear guidance about health and safety regulations for re-opening/continuing programs and services, engaging with volunteers, and partners
  - Training, expertise and supplies for safety protocols
6. Enhance internal communication
  - Leadership model and an effective professional culture
  - Maintain Partnerships and collaborative capacities
7. Build technological infrastructure
  - Prioritize virtual access to accommodate clients and provide access to vital information regarding COVID-19 regulations and essential resources

**\*\*Please note that any and all submissions by Nonprofit Organizations will be measured and weighed for consideration depending on the needs of said Nonprofit Organization and the rational proposed responses for systematic operations during COVID-19.**

## **ELIGIBILITY ANALYSIS**

### **INTRODUCTION**

This memo analyzes whether the American Rescue Plan Act (“ARPA”) funds received from the Federal Government can be used for direct assistance to non-profit organizations and other NGOs. The analysis below shows that funding for this purpose does qualify as an eligible use under ARPA subject to the bounds discussed below.

### **SUMMARY OF LEGAL ISSUES**

The American Rescue Plan Act establishes four categories for eligible use of State and Local Fiscal Recovery Funds. Section 602(c)(1)(A) specifically authorizes “assistance to households, small businesses, and nonprofits...”

The US Department of Treasury has released guidance on aid to nonprofits in both the Interim Final Rule (IFR) and the Final Rule. The Final Rule reiterates much of the guidance from the IFR, which included a non-exhaustive list of eligible uses such as:

- “Loans or grants to mitigate financial hardship such as declines in revenues or impacts of periods of business closure, for example by supporting payroll and benefits costs, costs to retain employees, mortgage, rent, or utilities costs, and other operating costs;
- Loans, grants, or in-kind assistance to implement COVID-19 prevention or mitigation tactics, such as physical plant changes to enable social distancing, enhanced cleaning efforts, barriers or partitions, or COVID-19 vaccination, testing, or contact tracing programs; and
- Technical assistance, counseling, or other services to assist with business planning needs.” 31 CFR 35 (IFR P. 35 accessed via PDF).

The Final Rule also specifies that “recipients may provide direct assistance to nonprofits if the nonprofit has experienced a public health or negative economic impact as a result of the pandemic.” 31 CFR 35 (Final Rule P. 156 accessed via PDF). The same general requirements are in place for assistance to these organizations.

The Final Rule, however, does make certain changes that affect this eligibility analysis. First, nonprofits in US Territories are presumed to be disproportionately affected, reducing the administrative burden in making determinations in that regard. This will allow ASG’s assistance programs to better focus on programs that will be of assistance to nonprofits and the community-at-large by simplifying the criteria.

Second, Treasury has expanded the types of nonprofits eligible for direct assistance to include both 501(c)(3) and 501(c)(19) organizations. The 501(c)(19) organizations include veterans' groups and align more with the criteria from the CARES Act, which specifically included this type of organization. This expansion will again broaden the possibilities for ASG in awarding funds.

Lastly, the Final Rule includes much discussion of the distinction between beneficiaries and sub-recipients. A more thorough discussion of this issue will take place below, but nonprofits can qualify as either depending on the program.

## **ANALYSIS**

As stated above, there is a non-exhaustive list of programs that would qualify as eligible uses in the context of aid to nonprofits. Insofar as any program is put forth that does not fit squarely within those uses, the Final Rule offers similar guidance to the IFR in assessing the eligibility of potential uses, namely that they respond to the public health or negative economic impacts. Part of the identified need for any analysis is factored in by the Final Rule stating that all nonprofits within the Territory are disproportionately impacted, thus needing to focus squarely on how the program seeks to remedy the impact.

Aside from the above analytical framework, it is important that the distinguishing lines between beneficiaries and sub-recipients are clearly defined. The Final Rule states that nonprofits are sub recipients if they receive funds to administer programs on behalf of the recipient. In this respect, any nonprofit organization would qualify to be a sub recipient. Any program where a nonprofit is a sub recipient would require that the organization be responsible for reporting requirements in the same way that government agencies administering funds are (subject, of course, to the requirements of Treasury).

There are, however, areas where nonprofits are beneficiaries. This is the area of most relevance to this discussion. The non-exhaustive list set forth in the IFR and seconded in the Final Rule are direct benefit programs that would make each nonprofit a beneficiary. For these programs, beneficiaries do not have the reporting requirements that sub recipients have. In addition, certain assistance for COVID-19 mitigation and prevention is presumed eligible:

“As with all enumerated eligible uses, recipients may presume that all COVID-19 mitigation and prevention programs and services are reasonably proportional responses to the harm identified unless a response is grossly disproportionate to the type or extent of harm experienced... In other words, recipients can provide any COVID-19 prevention or mitigation service to small businesses, nonprofits, and businesses in impacted industries without any further analysis of impacts of the pandemic on those entities and whether the service is responsive.” 31 CFR 35 (Final Rule P.63 accessed via PDF).

Importantly, Treasury further distinguishes those entities may otherwise be ineligible to receive assistance would qualify for this assistance since it goes directly towards prevention/mitigation. Again, the Final Rule is attempting to broaden the scope of eligibility by these designations. In short, direct assistance to nonprofits is specifically addressed and the Final Rule makes clear that

so long as it is proportional to the harm being remedied, it will be an eligible use since all nonprofits in American Samoa are classified as disproportionately impacted.

## **CONCLUSION**

Based on the guidance under the Interim Final Rule and the analysis for eligible uses, ASG's Nonprofit Program is an eligible use of funds subject to the limitations identified by Treasury and discussed above.

## **SCOPE OF WORK**

Proposals and applications approved for this ARPA award should meet statutory requirements and eligibility. The sole purpose is providing assistance to eligible non-profit organizations to continue and stabilize operations for continuous service in addressing local needs. It is highly recommended for eligible use or costs charged to be service driven to provide a more powerful and effective impact with long lasting benefits to the community. This program is a reasonable response to the pandemic and its negative impacts to support non-profit entities and thus improve health, social and economic outcomes across American Samoa especially for disadvantaged and highly populated areas. In addition, this allocation will help contribute to improvements in promoting a strong, healthy and safe neighborhoods and communities.

### **I. Application or Proposal Guidelines (For Non-Profit Entities):**

The application or proposal should include the following components:

- a. Non-profit organizational profile. List present physical location and address
- b. Proposal narrative to include program background and description:
  - i. Describe your non-profit organization, its main mission and purpose, primary duties and services and programs offered to the community. List total number of employees and/or volunteers, average population served, date of initial operations in American Samoa, and any accomplishments by organization
  - ii. Describe and identify the need, harm, or negative impact experienced by your organization as a result of Covid-19 public health emergency. Please elaborate and provide any supportive information such as listed below for clarity and understanding:
    - Decreased revenue (e.g., from donations and fees)
    - Financial insecurity
    - Increased costs (e.g., uncompensated increases in service need)
    - Capacity to weather financial hardship



- Challenges covering rent or mortgage, and other operating costs
- iii. Describe and identify the proposed solution, remedy or response to address the need or harm. Please elaborate and provide details, justification, and any supportive information and data.
  - a. Scope of Work
  - b. Implementation Plan and Timeline
  - c. Proposed Itemized Budget

## **II. Application or Proposal Evaluation Criteria:**

1. Organization or entity must meet the definition of “non-profit” – especially those that are 501(c)(3) or 501(c)(19) tax-exempt organizations.
2. Organization or entity who has experienced decrease revenue (e.g. from donations and fees) due to negative impacts of Covid-19
3. Organization or entity who has faced financial insecurity due to negative impacts of the pandemic
4. Organization or entity who has encountered increased costs due to negative results of Covid-19
5. Organization or entity who has faced incapacity to weather financial hardship due to negative impacts of Covid-19
6. Organization or entity who has encountered challenges covering rent, or mortgage, and other operating costs due to negative impacts of Covid-19
7. Organization or entity that has experienced decline in volunteer staffing and significant job losses due to negative impacts of the pandemic
8. Organization or entity that has been impacted by negative results of the pandemic
9. Organization or entity that has encountered major challenges due to negative impacts of Covid-19
10. Organization or entity that has experienced increased demand for services and changing operational needs due to the pandemic

## **III. Proposals will be prioritized based on their inclusion/non-inclusion of the following:**

1. Proposal with greatest need due to financial insecurity or reduction in revenue

2. Proposal with no direct funding resources available or accessible to maintain and sustain operations
3. Proposal that are highly service driven
4. Proposal that has an official and certified copy of Articles of Incorporation recorded with the local Territorial Registrar's Office
5. Proposal that has a physical location and office space in the territory
6. Proposal that has a track record in providing effective services and programs in the community
7. Proposal with a clear and reasonably proportional response to the need or harm caused by COVID-19 public health emergency
8. Proposal that is well designed and focused on addressing urgent community needs especially for low to moderate income households and individuals
9. Proposal that executes a plan or strategy that is direct, efficient, impactful and quick in delivering and providing needed services and programs in the territory.

#### **IV. Panel Review Process:**

Applications and proposals meeting eligibility and criteria will go through a panel for further review and screening.

- a. A panel of four (4) members will be selected from those with experience and extensive knowledge in non-profit organizations
- b. Panelists will be designated and approved by the Executive Director of CJPA
- c. Panelists will use the following as guidance to assist them during review and selection process:
  - i. Summary of requirements and clarity in the final rule for assistance to non-profits
  - ii. ARPA category requirements for non-profit assistance
  - iii. ARPA requirements, guidelines, goals and objectives
  - iv. Evaluation Criteria as noted above in #2
- d. Panelists will evaluate and assess each application for strength and ability to provide necessary information and justification to support need/harm and proposed response to address such need/harm.

e. Panelists will be reminded of adherence to transparency and accountability during the selection process

#### **V. Compliance:**

Selected applicants or proposals will be required to comply with the following ARPA federal requirements and guidelines:

- a. Proposal shall comply with ARPA reporting requirements
- b. Proposal shall comply with award terms and conditions
- c. Proposal shall comply with eligible use requirements
- d. Proposal shall continue using strong transparency and accountability systems
- e. Proposal shall comply with reasonableness, allowability and allocable costs per Uniform Guidance and Cost Accounting Principles
- f. Proposal shall comply with equipment purchasing requirement
- g. Proposal shall comply with conflicts-of-interest policy and ethics rule requirements
- h. Proposal shall comply with ASG procurement process and requirements
- i. Proposal shall comply with local certification, licensing, and permitting laws
- j. Proposal shall comply with CDC requirements, guidelines, and practices to promote a healthy and strong environment preventing further spread of Covid-19
- k. Proposal shall comply with strong labor standards and practices

#### **COMMUNITY ENGAGEMENT**

This is an important process which will include inputs from stakeholders and the general public. Please refer to the attached Appendix A for community engagement plan.

## IMPLEMENTATION PLAN & TIMELINE

<b>Program Plan Description</b>	<b>Start Date</b>	<b>End Date</b>
Pre-survey disbursement	06/06/2022	06/13/2022
Public Workshops/Public Hearings *2 sessions of in-person workshop hosted by CJPA at the DOC conference room on 6/13/22 *Virtual Zoom Meeting on 6/23/22	06/13/2022	06/23/2022
Public Engagement Comment Period	06/13/2022	06/28/2022
Deadline for Submission of Non-profit Proposals	n/a	07/15/2022
Review Applications from Non-profit Entities *Immediate review by CJPA upon receipt of applications on first come, first served basis	07/15/2022	07/29/2022
Panelists Review of Proposals *Including ARPA Oversight input	07/29/2022	08/19/2022
Award of Assistance to Eligible Non-Profit Organization *Tentative date	08/26/2022	8/26/2022
Monitoring of Program	08/26/2022	12/31/2026

**ARPA funds are required by federal statute to be encumbered by December 31, 2024 and spent by December 31, 2026. 31 CFR 35.5. This mandate makes the need for a definite timeline for completion of projects of critical importance.**

## PROPOSED ITEMIZED BUDGET

Total of 4.5 million of ARPA funds is allocated for this particular program. Proposed budget should be itemized or broken down outlining all costs related to the program. These costs must be allowable, necessary, and eligible under ARPA in support of its goals, outcomes and objectives.

<b>Budget Category</b>	<b>Description – Non-Profit Assistance Program (NAP)</b>	<b>Requested funding</b>
<b>Personnel Costs</b>		
Fiscal Officer/Finance Analyst	Full-time FO (6% of base salary of \$51K per annum) = \$3,060  \$3,060 x 3 years (expected life of program) = \$9,180	\$9,180.00
Program Manager	Full-time PM (100% of base salary of \$45K per annum)  \$45,000 x 3 years (expected life of program) = \$135,000	\$135,000.00
<b>Total Personnel Costs:</b>		<b>\$144,180.00</b>
<b>Fringe Benefits:</b> 10% Retirement 7.65% FICA 1.05% Workmen’s Comp		
Fiscal Officer/Finance Analyst (\$9,180)	10% Retirement 7.65% FICA 1.05% Workmen’s Comp	\$1,716.66
Program Manager (\$135,000)	10% Retirement 7.65% FICA 1.05% Workmen’s Comp	\$25, 245.00
<b>Total Fringe Benefits (18.7%)</b>		<b>\$26,961.66</b>
<b>Indirect Costs (28% of Total personnel cost and fringe benefits)</b>		<b>\$47,919.67</b>
Supplies	Computer desktop, laptop, industrial printer, printer ink, copy paper, etc.	\$15,000.00

Marketing	Advertisement fees, facility rent, rental equipment.	\$10,000.00
<b>Total Supplies &amp; Marketing Costs (0.5% of grant award)</b>		<b>\$25,000.00</b>
<b>Sub recipient Allocations</b>	<u>Budget:</u> Personnel \$144,180.00 Fringe Benefits \$26,961.66 IDC Costs \$47,919.67 <u>Supplies &amp; Marketing \$25,000.00</u> Total \$244,061.33	<b>\$244,061.33</b>
<b>Beneficiaries Allocation</b>	\$4,500,000.00 - <u>\$244,061.33</u> <u>\$4,255,938.67</u>	<b>\$4,255,938.67</b>
<b>Total Costs</b>		<b>\$4,500,000.00</b>

## APPENDIX A: COMMUNITY ENGAGEMENT PLAN

Community engagement is an essential aspect of ARPA funded projects. The intent of the US Treasury in fostering public participation is to maintain transparency and provide opportunities for feedback to ensure that funds are used in the most beneficial manner.

In keeping with the intent of the US Treasury and the American Samoa ARPA Oversight Office, the Criminal Justice Planning Agency (CJPA) has adopted the following notice and comment timeline for proposed projects:

- A Notice of the ARPA Proposed Projects will be published online, in local newspapers, and via television or radio broadcasts.
- The Notice will specify that there will be no less than fifteen (15) days for the public to provide comment either in writing or by attendance at scheduled public hearings.
- Concurrent to the publication of the Notice, a draft proposal and scope of work will be published on the ARPA website for the public to review.
- General meetings with the public will be scheduled and publicized within the fifteen (15) day notice period. Email comments will be accepted.
- Presentations to the Legislature will be conducted during the Notice period, as needed.
- At the close of the public comment period, the agency will have no less than 20 days to revise the project as appropriate and submit the Final Draft to the ARPA Oversight Office.
- The Final Draft of the Project will be posted for public review once completed and certified by the ARPA Oversight Office.

It is the responsibility of CJPA to publish notices and adhere to the stated timelines.

Upon the final approval of the ARPA Oversight Office, CJPA will initiate a general public engagement schedule to inform the community of the final program guidelines.

Engagement Schedule:

1. June 06, 2022– Initiated Community Engagement Plan
  - a. Pre-survey distributed
  - b. Notice has been published online, in local newspaper, TV & Radio
  - c. Application requirements and other program details have been published
2. June 13, 2022 – General Meeting with Public at DOC conference room
3. June 28, 2022 – Public Comment period closed
4. July 18, 2022 – CJPA revised the project as appropriate and submitted final draft to ARPA Oversight Office.